

FinCEN Statement Regarding Administrative Ruling FIN-2013-R001, July 12, 2013

With respect to the Administrative Ruling FIN-2013-R001 issued on July 12, 2013, pertaining to the Treatment of Armored Car Service Transactions Conducted on Behalf of Financial Institution Customers or Third Parties for Currency Transaction Report Purposes, FinCEN understands that certain institutions seeking to take advantage of the exceptive relief offered in that ruling are continuing to develop systems to do so, and may not be in a position to implement in the timeframe that FinCEN anticipated. We remind institutions that they can continue to file consistent with the previous guidance and that they are not required to take advantage of the exceptive relief. We also understand that institutions may still have questions as to specific information expected in a limited number of fields. As always, institutions may contact the FinCEN Resource Center with any questions at 1-800-767-2825 (800-SOS-BUCK) or by sending an e-mail to FRC@fincen.gov. FinCEN plans to continue monitoring questions received by the FinCEN Resource Center on this issue and update any guidance or frequently asked questions as necessary. We request that institutions comply with either approach to CTR reporting per Administrative Ruling FIN 2013-R001 as soon as possible.